Sanga, Ravi

From: Hoffman, Erika

Sent: Monday, August 05, 2019 4:33 PM

To: david.w.stalters@uscg.mil.

Cc: Sanga, Ravi; James.C.Hall2@uscg.mil

Subject: FW: USCG Pier 36 data and ramifications for Pier 36B structural repairs project

Attachments: nws-2018-700.pdf

Forwarded to David Stalters because Constance is on vacation.

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From: Hoffman, Erika

Sent: Monday, August 05, 2019 3:54 PM

To: Sanga, Ravi <Sanga.Ravi@epa.gov>; Callahan, Constance M CIV <Constance.M.Callahan@uscg.mil> **Cc:** Lee, Rory W CIV USARMY CENWS (USA) <Rory.W.Lee@usace.army.mil>; James.C.Hall2@uscg.mil

Subject: USCG Pier 36 data and ramifications for Pier 36B structural repairs project

Ravi and Constance,

I wanted to alert you to a concern that I have about the BMPs associated with upcoming work at Pier 36 involving preparation of piles for installation of pile jackets (NWS-2018-700). According to the project description and BMP memo (attached), the second season of work to be done at Pier Bravo will include the installation of new structural reinforced polymer jackets on approximately 27 existing timber piles. In order to prepare the piles for jacketing, divers will be cleaning piles of marine growth using hand tools. The BMPs proposed for this work are the same as those used during the first phase of structural repairs (2013) and are described as follows:

Contractor shall use hand tools to remove marine growth from piles sufficient to properly make repairs. Marine growth removed from the pile shall be captured (i.e. mesh diver bags and pile skirts) and disposed of offsite at an approved upland disposal site. Contractor shall remove old creosote treated timber and pile debris from the work area as it is encountered and when it can be accomplished safely.

Based on draft sediment data that we have recently received from the Coast Guard, I have reason to believe that the BMPs for the first phase of pier repairs (in 2013) were either not implemented or were not effective at limiting/preventing the release of PAH-contaminated debris (fouling organisms and/or creosoted wood) into the surface sediments beneath the pier. This is the 2nd set of sediment data collected since the first phase of Pier repairs was completed in 2013. This data set, like the previous

data, shows high levels of sediment contamination both in the berth area adjacent to the pier and under the piers themselves. All of the surface sediment (0-10cm) samples collected beneath Pier Bravo are characterized by highly elevated total PAHs (37-527 ppm) and unusually high organic carbon (4.8 - 15%). In my experience, elevated TOCs such as these are usually associated with wood waste or biologically-based debris; TOCs this high do not occur naturally in marine sediments of Puget Sound. In contrast, the surface sediments beneath Alpha Pier have much lower PAHs and % TOC in the standard range for Slip 36 (1.3 - 2.1%). I'm concerned that in the under-pier data, we may be seeing the creosote-contaminated wood and fouling organisms that were not properly collected after scraping during the first phase of pier repairs. To my knowledge, no piling repair has been performed in the area around Alpha pier.

In my opinion, the BMPs proposed above, if implemented correctly and carefully, can significantly limit the amount of PAH-contaminated material that will remain in the surrounding under-pier sediments. It is critical that the Coast Guard alert their contractor to this issue and conduct oversight of construction to insure that any and all fouling/wood debris generated by Phase 2 structural repairs is being removed from the marine environment. Doing so will not only remove a significant source of PAH contamination from the environment, but it will also reduce the extent to which future remediation may be needed in Slip 36 due to PAH contamination.

Thanks

Erika

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